BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue

Implementation and Administration of California

Renewables Portfolio Standard Program.

Rulemaking 06-05-027 (Filed May 25, 2006)

SDG&E'S AUGUST 2008 SEMI-ANNUAL COMPLIANCE REPORT PURSUANT TO THE CALIFORNIA RENEWABLES PORTFOLIO STANDARD

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CALIFORNIA'S RENEWABLES PORTFOLIO STANDARD

Reporting and Compliance Worksheet Instructions

- 1. California's RPS Program requires Investor Owned Utilities (IOU), Multi-Jurisdictional Utilities (MJU), and Electric Service Providers (ESP) file a minimum of two reports each year illustrating performance within the program.
 - > The March 1 report (with updates after the California Energy Commission (CEC) verifies procurement, as needed) is used by the Commission to determine compliance for the prior year(s). This report states historic performance in the RPS program, current year targets and procurement data, and forecasts targets and procurement data for at least three years (D.06-10-050, page 45, 49).
 - > The August 1 report states historic performance in the RPS program, current year targets and procurement data, and forecasts targets and procurement levels for each year forward through 2020 (D.06-10-050, page 45, 51). The August report may be used by the Commission to make a final determination of compliance for the prior year(s).
- 2. If any load serving entity (LSE) seeks confidentiality protection for any of the information required by the RPS Compliance Report, it shall comply with the substantive and procedural rules set forth in D.06-06-066, as modified by D.08-04-023, the Commission's decision in its Confidentiality proceeding, Rulemaking (R.) 05-06-040, and any subsequent decisions issued in the same or successor proceeding. A declaration for Confidentiality should include the identification of all redacted information by tab name and cell reference.
- 3. RPS compliance reports will be submitted to the Commission as specified below:
 - > Serve a public version on the service list in proceeding R.06-05-027
 - > File a confidential version with the Energy Division
- Any questions regarding the completion and/or filing of this report can be directed to: Sean Simon, Energy Division, California Public Utilities Commission: svn@cpuc.ca.gov, (415) 703-3791
- 5. Please make sure that the following information about the filing entity is included on each tab:
 - > Name of the LSE filing the Report
 - > Date the Report is being filed
- 6. Include a Title Page in accordance with the Commission's Rules of Practice and Procedure (Rule 1.6)
- 7. Complete the Officer Verification Form in the format provided (Rule 1.11)
- 8. Yellow cells throughout the spreadsheet indicate user supplied data by the LSE where and when applicable.
- 9. All data must be entered in MWh out to three decimal points to accurately account for retail sales, procurement and targets. The spreadsheet will display MWh throughout. Do not round any reporting data.
- 10. The spreadsheet included in this report has locked cells to ensure that targets, procurement and penalties are accurately calculated and reported from the data provided by the user. An unprotected version of the spreadsheet is also available by request.
- 11. Line #s in the "Accounting" tab hyperlink to the "Calculations" tab, which provides additional information on the particular line item or section of the "Accounting" tab.

SUMMARY TAB	
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- 12. The "Summary" tab is linked to the "Accounting" tab and "Procurement Detail" tab, no data entry is required.
- 13. If the LSE determines that additional information is required in order to present a full and complete report, mark the box provided on the "Summary" tab. Any additional information should support the LSE's claim within the guidelines of the eight allowable reasons for noncompliance. Furthermore, please state anything else the filing LSE believes is necessary for a full and complete reporting to the Commission in order to allow an informed decision on compliance. This may include, for example, footnotes and other explanatory information as necessary and reasonable.

ACCOUNTING TAB	
ACCOUNTING TAB	

- 14. Begin by entering the relevant data for Lines 1-3, this will calculate the LSE's Baseline Procurement Amount. Enter actual and forecasted sales figures to generate Incremental Procurement Targets (IPTs) and Annual Procurement Targets (APTs).
- 15. In deficit years, the spreadsheet calculates what portion of the deficit is eligible for IPT deferral and Earmarking. The user records how they elect to treat the deficit(s) in the relevant sections, including using surplus procurement. The spreadsheet calculates the allowable IPT deferral and Earmarking amount through 2020.

EARMARKING DETAIL TAB

16. Enter information for contracts that are eligible for earmarking and are being used for flexible compliance purposes. Data populates the earmarking section in the "Accounting" tab.

PROCUREMENT DETAIL TAB

- 17. Procurement Summary: Total RPS Eligible Procurement is differentiated by three categories, existing and or signed contracts, short-listed/under negotiation/pending approval, and generic future contracts. This section is populated by completing the Contract Detail section below. If the LSE has entered into contracts that are short-term or with existing facilities but cannot meet its Annual Minimum Contracting Requirement, then deliveries from those contracts may not be used for compliance in any year (D.07-05-028).
 - > Annual Contracting Quota Requirement: LSEs must enter into long-term contracts or contracts with new facilities for energy deliveries equivalent to at least 0.25% of that LSE's prior years' retail sales, if it intends to use deliveries from short-term contracts and/or existing facilitites, for RPS compliance purposes.
 - Contracts are differentiated by Contract term-length and type (row 15:16). All deliveries from "long-term and/or new" are automatically entered into "Cumulative Surplus Contracting Quota Bank" (row 19) and the user must input the MWh in row 18 that the LSE needs to comply with the Annual Contracting Quota Requirement, if necessary.
- 18. RPS Eligible Procurement by Resource Type: This report must state the amount procured or projected to be procured from each resource type (D.05-07-039, Appendix A, D.06-10-050, page 47-48). This information is reported in rows 25-38 in the "Procurement Detail" tab and populated by completing the "Contract Detail" section.
- 19. <u>Contract Detail:</u> For each contract, enter actual and forecasted delivery data throughout the contract term. Do not assume that an expiring contract will be renegotiated. In the first year a project is no longer under contract, remove the contract and/or MWh deliveries (in the case of pre-2002 contracts), and list the contract in the Expired Contracts section below.
 - > Pre-2002 Contracts: Input total annual deliveries by resource type
 - > 2002-2008 years' Contracts: List contracts by name, annual deliveries (MWh), project status, facility status and resource type.
 - > 2005-2008 years' Contracts: In addition to the requirements above, Contracts from these years should be identified by term-length, short-term (less than 10 years) and long-term, as well as, by type, existing or new (defined below). For 2005 and 2006 contracts that were signed prior to 2007 can be identified as "n/a" for this purpose (refer to Column "X").
 - "Contract Length / Type" (Column "X") Pursuant to D.07-05-028, starting in 2007, each RPS-obligated LSE must, in order to be able to count for any RPS compliance purpose energy deliveries from contracts of less than 10 years' duration ("short-term") with RPS-eligible facilities that commenced commercial operation prior to January 1, 2005 ("existing facilities"), in each calendar year enter into contracts with facilities of at least 10 years' duration ("long-term") and/or short-term contracts with facilities that commenced commercial operation on or after January 1, 2005 ("new facilities") for energy deliveries equivalent to at least 0.25% of that LSE's prior year's retail sales ("minimum quantity").
 - "Contract Volume" (Column "Y") Input the total annual MWh as identified in the contract. Compliance with the minimum quota requirement is measured by contracted-for-energy, not deliveries.
 - > "Generic Future Contracts": Input total forecasted annual deliveries by resource type
 - > "Expired Contracts": User should identify expired contract by name and input annual deliveries (MWh) in the first year contract is no longer delivering for the LSE (per existing contract) and in every year thereafter. For example, if a contract with annual deliveries of 10,000 MWh expired 12/31/2007, user should enter 10,000 MWh in 2008 and in every year thereafter. If this same contract expired 6/30/2007, user should enter 5,000 MWh in 2007 and 10,000 in every year thereafter. If an expired or expiring contract is re-signed, remove contract information from "Expired Contracts" section and enter it under the appropriate contracting year, as you would for any other contract.
- 20. In the "Contract Status" column, "short-listed and/or under negotiation" is an option; use the short-listed option only for projects for which the IOU has a high level of confidence that a contract will be executed.
- 21. If any procurement data for a specific contract differs from what is entered into the CEC-RPS-Track form for that year, the specific cell should be highlighted and the discrepancy should be explained.

Spreadsheet user notes

- > Protecting confidential data: Individual cells may be formatted black, which will serve to redact info when excel file is converted to pdf. Select cell click on "fill color" icon choose black. Note: Once converted to pdf, additional steps are necessary to ensure redacted data is not accessible.
- > Adding and/or deleting rows. The "Earmarking Detail" tab and "Procurement Detail" tab allow user add to or delete rows. Within the desired section, highlight entire row(s) by selecting the excel row number(s) right click and select "copy" right click again and select "insert copied cells"

SDG&E	2004
15-Aug	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	15,043,865	
Annual Procurement Target (APT)	446,625	3.0%
Total RPS Eligible Procurement	677,852	4.5%
Annual Procurement Surplus/(Deficit)	231,227	
Adjusted Procurement Percentage*		4.5%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	337,466	49.8%
Digester Gas	23,451	3.5%
Biodiesel	0	0.0%
Landfill Gas	189,024	27.9%
Muni Solid Waste	0	0.0%
Biopower Subtotal	549,941	81.1%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	13,134	1.9%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	114,778	16.9%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	677,852	100.0%

Flexible Compliance	MWh
IPT Deferral	0
Earmarking	N/A
Banked Procurement Applied	0
Total Flexible Compliance	0

Deficits and Penalties	2004
Preliminary Procurement (Deficit)	0
Adjusted Annual Procurement Deficit	0
Adjusted Deficit Deferred	0
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include
attachments as needed).

 Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-05-010 and Public Utilities Code Section 399.14(a)(2)(C)(ii).)

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]

SDG&E	2005
15-Aug	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	15,811,591	
Annual Procurement Target (APT)	604,741	3.8%
Total RPS Eligible Procurement	825,366	5.2%
Annual Procurement Surplus/(Deficit)	220,625	
Adjusted Procurement Percentage*		5.2%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	298,945	36.2%
Digester Gas	23,768	2.9%
Biodiesel	0	0.0%
Landfill Gas	194,455	23.6%
Muni Solid Waste	0	0.0%
Biopower Subtotal	517,168	62.7%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	11,764	1.4%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	296,434	35.9%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Fligible Procurement	825 366	100.0%

Flexible Compliance	MWh
IPT Deferral	0
Earmarking	0
Banked Procurement Applied	0
Total Flexible Compliance	0

Deficits and Penalties	2005
Preliminary Procurement (Deficit)	0
Adjusted Annual Procurement Deficit	0
Adjusted Deficit Deferred	0
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include
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[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]

SDG&E	2006
15-Aug	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	16,001,516	
Annual Procurement Target (APT)	764,756	4.8%
Total RPS Eligible Procurement	899,520	5.6%
Annual Procurement Surplus/(Deficit)	134,765	
Adjusted Procurement Percentage*		5.6%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	284,031	31.6%
Digester Gas	21,243	2.4%
Biodiesel	0	0.0%
Landfill Gas	179,895	20.0%
Muni Solid Waste	0	0.0%
Biopower Subtotal	485,169	53.9%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	11,584	1.3%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	402,768	44.8%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	899,520	100.0%

Flexible Compliance	MWh
IPT Deferral	0
Earmarking	0
Banked Procurement Applied	0
Total Flexible Compliance	0

Deficits and Penalties	2006
Preliminary Procurement (Deficit)	0
Adjusted Annual Procurement Deficit	0
Adjusted Deficit Deferred	0
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include
attachments as needed).

Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-05-010 and Public Utilities Code Section 399.14(a)(2)(C)(ii).)

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]

SDG&E	2007
15-Aug	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	16,846,888	
Annual Procurement Target (APT)	933,225	5.5%
Total RPS Eligible Procurement	880,777	5.2%
Annual Procurement Surplus/(Deficit)	(52,447)	
Adjusted Procurement Percentage*		5.5%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	217,967	24.7%
Digester Gas	18,466	2.1%
Biodiesel	0	0.0%
Landfill Gas	153,184	17.4%
Muni Solid Waste	0	0.0%
Biopower Subtotal	389,617	44.2%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	21,302	2.4%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	469,859	53.3%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	880,777	100.0%

Flexible Compliance	MWh
IPT Deferral	0
Earmarking	0
Banked Procurement Applied	52,447
Total Flexible Compliance	52,447

Deficits and Penalties	2007
Preliminary Procurement (Deficit)	(52,447)
Adjusted Annual Procurement Deficit	0
Adjusted Deficit Deferred	0
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include
attachments as needed).

 Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-05-010 and Public Utilities Code Section 399.14(a)(2)(C)(ii).)

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]

RPS Compliance Report: Accounting

SDG&E 8/15/2008

Line#	RPS Baseline Calculation	(MWh)
1	2001 Total Retail Sales	14,998,806
2	2001 RPS Eligible Procurement	145,760
3	2003 Total Retail Sales	15,043,865
4	2003 Baseline Procurement Amount	296,186

			Actual				Forecast			Forecast					Porecast			
RPS Procurement and Targets (MWh)	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
5 Bundled Retail Sales	15,043,865	15,811,591	16,001,516	16,846,888	17,056,023					18,736,690	19,044,058	19,346,534	19,649,908	19,949,935	20,237,822	20,522,220	20,810,607	21,102,513
6 Total RPS Eligible Procurement	549,856	677,852	825,366	899,520	880,777	1,071,035	1,731,223	2,644,980	3,874,987	4,225,533	4,148,682	4,130,060	4,146,045	4,146,045	4,115,669	3,750,738	3,564,183	3,363,039
7 Annual Procurement Target (APT)	296,186	446,625	604,741	764,756	933,225						3,747,338	3,808,812	3,869,307	3,929,982	3,989,987	4,047,564	4,104,444	4,162,121
8 Incremental Procurement Target (IPT)	N/A	150.439	158,116	160,015	168,469						64,578	61,473	60,495	60,675	60,005	57,578	56,880	57,677
9 Preliminary Procurement Surplus/(Deficit)	253,670	231,227	220,625	134,765	(52,447)						401,344	321,249	276,738	216,063	125,682	(296,826)	(540,261)	(799,082)
10 APT Percentage	N/A	3.0%	3.8%	4.8%	5.5%						20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%
11 Actual Procurement Percentage	3.7%	4.5%	5.2%	5.6%	5.2%						22.1%	21.7%	21.4%	21.1%	20.6%	18.5%	17.4%	16.2%
12 Adjusted Procurement Percentage*	N/A	4.5%	5.2%	5.6%	5.5%						22.1%	21.7%	21.4%	21.1%	20.6%	18.5%	17.4%	16.2%
			Actual			1	Forecast		Т	Forecast		I			Forecast			
Flexible Compliance - IPT Deferral	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
13 Maximum Deficit Eligible for Deferral	N/A	0	1 000	0	42,117	2000	2000	1 2010	2011		0	0	0	0	0	50,595	51,306	52,027
	N/A	1 0	0	1	1 0						0	0	1 0	1 0	1 0	0	0	0
14 Deficit being Carried Forward to Year + 1 15 Deficit being Carried Forward to Year + 2	N/A		+	0	 						<u>0</u>	1 0	†ŏ	1 0	Ö	0	† -	0
16 Deficit being Carried Forward to Year + 2	N/A	- 	† 0	- 	 						0	†ö	1 0	1 0		1 0	0	0
	N/A	0	. 0	0	0						0	0	0	, ,	0	0	0	0
17 Total Current Year Deficit Carried Forward 18 Remaining Deficit from Year - 1 to Be Filled in Current Year	N/A N/A	N/A	1 0	1 0	1 0						0	T 0	T 0	1 0	T 0	1 0	1 0	1 0
18 Remaining Deficit from Year - 1 to be Filled in Current Year 19 Remaining Deficit from Year - 2 to Be Filled in Current Year	N/A	N/A	N/A		+						ö	† <u>ö</u>	10	+ŏ	1 0	0	i o	1 0
	N/A	N/A	N/A	N/A	+						0	0	0	1 0	0	0	0	0
	N/A	N/A	1 100	1 100	1 0						0	0	0	1 0	0	0	0	0
	N/A	N/A	1 0	1 0	T 0						0	1 0	1 0	1 0	1 0	1 0	1 0	1 0
	N/A	N/A	T N/A	+	 						<u>0</u>	t	†ō	1 0	0	0	0	0
	N/A	N/A	N/A	N/A	+ 							1 0	0	1 0	1 0	1 0	0	0
24 Current Year Surplus Procurement Applied to Year - 3 Deficit 25 Total Deliveries Applied to Prior Year IPT Deficits	N/A	N/A	0	0	1 0						0	0	0	0	0	0	0	0
			Actual				Forecast			Forecast					Forecast			
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Flexible Compliance - Earmarking	2003 N/A	2004 N/A	2005	2006	10,330	2008	2009	2010	2011	2012	2013	2014	2015	2016	0	246,232	488,955	747,056
26 Portion of Current Year Deficit Eligible for Earmarking 27 Future Year Deliveries Earmarked from Year + 1	N/A	N/A	1 0	+ 0	10,330						0	0	1 0	1 0	1 0	1 0	1 0	0
	N/A	N/A	+		+	-						† <u>~</u>	† <u>~</u>	+	+	1 0	+	1 0
	N/A	N/A	†		+						0	†ŏ	† -		0	1 0	1 0	0
	N/A	N/A	1 0	0	1 0						0	0	0	0	0	0	. 0	, 0
30 Total Projected Procurement Earmarked to Current Year 31 Current Year Deliveries Earmarked to Year - 1	N/A	I N/A	I N/A	T 0	1 0						Ö	T 0	1 0	1 0	1 0	. 0	1 0	1 0
32 Current Year Deliveries Earmarked to Year - 2	N/A	N/A	N/A	N/A	+						0	†ö	1 0	1 0	0	1 0	0	0
33 Current Year Deliveries Earmarked to Year - 3	N/A	N/A	N/A	N/A	N/A							† <u>``</u>	1 0	1	1 0	1 0	0	0
34 Total Deliveries Earmarked to Prior Year Earmarked Deficits	N/A	N/A	N/A	1 100	1 100	-					0	0	0	0	0	0	0	0
Julia Deliveres Lamarked (Critis) Teal Lamarked Delicits		NA TOTAL CONTRACTOR OF THE PARTY OF THE PART	Actual				Forecast			Forecast		Τ			Forecast			
Complete Description of Boards	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Surplus Procurement Bank 35 Surplus Procurement Bank Balance as of Prior Year	2003	253,670	484.897	705,522	840,287	787.840	2009	2010	2011	2012	2.041.464	2.442.808	2.764.057	3.040,795	3.256,859	3,382,541	3.382.541	3.382.541
		203,670	+ 404,897	700,522	52,447	167,840					6,041,404	£,2,000	1 2,134,007	1 0,040,750	0,200,000	1 0,002,041	0,002,041	
	253.670	231,227	220,625	134.765	02,447						401.344	321,249	276,738	216.063	125,682	1	· · · · · ·	1 0
	253,670	484,897	705,522	840.287	787.840						2,442,808	2.764.057	3.040.795	3,256,859	3.382.541	3.382.541	3.382.541	3.382.541
38 Cumulative Surplus Procurement Bank Balance	1 200,070	1 404,097	1 100,022	1 0-0,207	707,040						2,1.2,000	1 -3. 5-7,007	1 0,0 70,700		1 2,222,041			
			Actual				Forecast			Forecast					Forecast			
			Actual				Forecast		-	rorecast		 			rorecast		4444	

RPS COMPLIANCE REPORT - August 2008

RPS Compliance Report: Earmarking Detail

Input Required
Forecasted Da

SDG&E 8/15/2008

		-									,					 	
			Actual			Forecast			Forecast					Forecast			
Total Annual Ear	rmarked Generation (MWh)	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
	Contracted Generation	0	0	0													
	Withdrawal from Current Year	0	0	0													
	Allocated to Year - 1	N/A	0	0													
	Allocated to Year - 2	N/A	N/A	0 '													
	Allocated to Year - 3	N/A	N/A	N/A													
Contract Name	Contracted Generation																
Eligible for [YEAR] deficit	Withdrawal from Current Year	0	0	0 '													
	Allocated to Year - 1	N/A	i	1 '													
	Allocated to Year - 2	N/A N/A	N/A N/A	1 '													
	Allocated to Year - 3			N/A													

Contract Name	Contracted Generation		T	
Eligible for [YEAR] deficit	Withdrawal from Current Year	0	0	0
	Allocated to Year - 1	N/A	1	
	Allocated to Year - 2	N/A	N/A	
	Allocated to Year - 3	N/A	N/A	N/A
Contract Name	Contracted Generation	1		
Eligible for [YEAR] deficit	Withdrawal from Current Year	0	0	0
	Allocated to Year - 1	l		
l	Allocated to Year - 2	N/A		
	Allocated to Year - 3	N/A	N/A	
Contract Name	Contracted Generation	1 .	1 .	
Eligible for [YEAR] deficit	Withdrawal from Current Year	0	0	0
	Allocated to Year - 1			i
l	Allocated to Year - 2	N/A	1	
	Allocated to Year - 3	N/A	N/A	
Contract Name	Contracted Generation			
Eligible for [YEAR] deficit	Withdrawal from Current Year	0	0	0
	Allocated to Year - 1			i
	Allocated to Year - 2	N/A	l	
	Allocated to Year - 3	N/A	N/A	
Contract Name	Contracted Generation		l .	
Eligible for [YEAR] deficit	Withdrawal from Current Year	0	0	0
	Allocated to Year - 1	1	1	
I	Allocated to Year - 2	N/A	I	
	Allocated to Year - 3	N/A	N/A	
Contract Name	Contracted Generation	1 .	l .	
Eligible for [YEAR] deficit	Withdrawal from Current Year	0	0	0
	Allocated to Year - 1			
	Allocated to Year - 2	N/A	l	
	Allocated to Year - 3	N/A	N/A	
Contract Name	Contracted Generation	1 .	l .	
Eligible for [YEAR] deficit	Withdrawai from Current Year	0	0	0
1	Allocated to Year - 1	1	1	
1	Allocated to Year - 2	N/A	I	
	Allocated to Year - 3	N/A	N/A	
Contract Name	Contracted Generation	1		
Eligible for [YEAR] deficit	Withdrawal from Current Year	0	0	0
	Allocated to Year - 1	1	1	
	Allocated to Year - 2	N/A	1	
	Allocated to Year - 3	N/A	N/A	
Contract Name	Contracted Generation			
Eligible for [YEAR] deficit	Withdrawal from Current Year	0	0	0
	Allocated to Year - 1			
	Allocated to Year - 2	N/A		
	Allocated to Year - 3	N/A	N/A	
Contract Name	Contracted Generation	1	1	
Eligible for [YEAR] deficit	Withdrawai from Current Year	0	0	0
l	Allocated to Year - 1			
	Allocated to Year - 2	N/A	1	
	Allocated to Year - 3	N/A	N/A	
Contract Name	Contracted Generation			
Eligible for [YEAR] deficit	Withdrawal from Current Year	0	0	0
	Allocated to Year - 1		1	
I	Allocated to Year - 2	N/A	1	
	Allocated to Year - 3	N/A	N/A	
Contract Name	Contracted Generation			
Eligible for [YEAR] deficit	Withdrawal from Current Year	0	0	0
	Allocated to Year - 1	1	l	
	Allocated to Year - 2	N/A		
	Allocated to Year - 3	N/A	N/A	

												RPS C	OMPLIANCE REI	PORT - August 200								
RPS Compliance Report: Procuremen	nt Detail		Input Require Forecasted D	nd Into	SDG&E 8/15/2008																	
			Actual Data																			
			Actual MWh				Forecast MWh			Forecast MWh					Forecast MWh				1			
Procurement Summary Total RPS Elipible Procurement Existing andlor Signed Contracts Short-late of Under Negotiation Pending Approval	2003 549,856 549,856	2004 677,852 677.852	2005 825,366 825,366	2005 899,520 899,520	2007 880,777 880,777	2008 1,071,035 1,016,858	2009 1,731,223 1,270,127	2010 2,644,980 1,680,307	2011 3,874,987 2,465,550	2012 4,225,533 2,806,387	2013 4,148,682 2,723,828	2014 4,130,060 2,701,689	2015 4,146,045 2,717,674	2016 4,146,045 2,717,674	2017 4,115,669 2,667,298	2018 3,750,738 2,322,367	3,564,183 2,203,132	2020 3.363.039 2.024.428				
Shori-lated/Under Negotiation/Pending Approval Generic Future Contracts Annual Contracting Quots Requirement RPS Contracts: long-term and/or new facilities		0				24.197	461.096 0 43,605	964.674 0 44,405	1,429,437 0 N/A	1.417.146 0 N/A	1.424.855 0 N/A	1.428.371 0 N/A	1.428.371 0 N/A	1.428.371 0 N/A	1.428.371 0 N/A	1.428.371 0 N/A	1.361.051 0 N/A	0 N/A				
RPS Contracts: long-term and/or new facilities RPS Contracts: short-term with existing facilities	N/A N/A N/A	N/A N/A N/A N/A	N/A N/A N/A N/A	NIA NIA NIA	N/A 221,617	N/A 0 0 221,617	4,400	10.002		- No.	- 100				- 100		- No	- MA				
RPS Contracts: short-term with existing facilities Surplus Contracting Quota Bank as of Prior Year Banked Surplus Applied to Annual Quota Cumulative Surplus Contracting Quota Bank Minimum Annual Contracting Quota Shortfa	N/A N/A N/A	NA NA NA	NIA NIA NIA		221,617 N/A																	
																			1			
RPS-Eligible Procurement By Resource Type Biograms Digester Cas Biodrams Landill Cas Muni Sold Washs Riscourse Exhibits	2003 341,718	2004 337,466	2965 298,945	2006 284,031	2007 217,957	2008 321,697	2009 612,181	2010 622,795	2011 054,405	2012 664,405	2013 564,405	2014 664,405	2015 664,405	2016 554,425	2017 554,405	2018 299,551	2019 232,231	2020 209,791				
Biodiesel Landill Gos	21,530 0 178,593	23,451 0 189,024	23,768 0 194,455		18,466 0 153,184	5,980 0 207,555	22,000 0 203,508	22,000 0 193,332	22,000 0 172,420	22,000 0 163,472	0 0 100,913	0 0 78,774	0 95,051	0 0 95,051	74,903	0 76,719	0 94,613	94,613				
Muni Solid Waste Biopower Subtotal Geothermal	0	0 542,941 0	0 517,168 0	0 485,169 0	389,617	535,232 0	0 837,689 0	0 838,127 0	0 858,825 485,530	0 849,577 485,530	0 765,318 485,530	743,179 485,530	759,456 485,530	759,456 485,530	739,308 485,530	0 376,270 485,530	0 326,844 485,530	0 304,404 485,530				
Biopower Subtotal Geothermal Small Hydro Conduit Hydro Pre-2002 Confracts	7,485 83,576	13,134 54,257	11,764 53,156	11,584 52,653	21,302 45,788	24,983 39,205	15,733 41,495	0 20,619 37,783	20,619 18,394	20,619	0 20,619 10,916	20,819 10,916	20,819	0 20,619 10,916	0 95,392 9,707	5,498 5,498	0 8,498 8,498	8,456 8,495		ı		
Digester Gas	0	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0			Digester Gas Digester Gas	
Landill Gas Muni Solid Waste	76,111	41,124	41,322	41,059	42,005	36,107	35,762	27,164	7,775	297	297	297	297	297	149	0	0	0	CPUC approved	online	Landfill Gas Muni Solid Waste Geothermal	
DIODESEI LandSI Gas Muni Sold Waste Geothernal Small Hydro Conduit Hydro Solar FV	7,465	13,134	11,764	11,584	3,783	3,098	5,733	10,619	10,619	10,619	10,619	10,619	10,619	10,619	9,559	0 5,495	0 0 8,498	0 0 8,498	CPUC approved	online	Small Hydro Conduit Hydro	
Solar PV Solar Thermal Wind Ocean/Tidal Fuel Cells	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			Solar PV Solar Thermal Wind Ocean/Tidal	
Ocean/Tidal Fuel Cells 2002 Contracts	466,280 341,718	623,595	772.210	744.089	641,634	411,345	0 0 412,595	411,017	0 0 409,494	408,024	345,465	317,384	315,833	0 0 315,833	0 315,833	315,833	0 178.704	0	Contract Status	Facility Status	Fuel Cells Resource Type	
Covaria Delano (formerly AES Delano) FPLWTE Acquistion GRS - Coyole Carryon	341,718 0 63,260	623,595 337,466 38,654 65,124	772,210 298,945 28,251 66,385	254,031 16,262 55,776	217,967 26,643 18,175	23,272 56,243	47,598 45,097		47,698 41,996	47,598 40,526	47,698		47,698	47,698		47,698	0	0	CPUC approved CPUC approved CPUC approved	online	Biomass Wind Landfill Gas	
GRS - Sycamore MM - San Diego - Minamar	13.785	8.735 27.378	14.502 27.898	13.938	13.889	14.558 32.827	18.615 25.800	18.615 25.800	18.615 25.800	18.515 25.800	18,613		0	0	0		0		CPUC accroved CPUC accroved	online online	Landfil Gas Landfil Gas	
MM - San Diego - North City MM Prima Deshechs Casis Power Partners	5.315 20.122	9,926 36,737 24	10.819 33.459 182.194	33,473	15,853			178,704	178,704	7.250 0 178.704	2.417 0 178.704	0	178.704	0 178.704	178.704	178.704	0 0 178,704	0	CPUC approved CPUC approved CPUC approved	online online online	Landfil Gas Landfil Gas Wod	
Ossis Power Partners Berdrola Renewables (formerly PPM Energy) San Diego MWD (Point Lorss) Confract Name	21,530 0	75,900 23,451	85,989 23,768	21,243	83.171 18,466	77.783	89.431 0	89.431	89.431	89.431 0	89.431	89.431 0	89.431	89.431 0	89.431	89.431 0	0	0	CPUC approved CPUC approved	online online	Wind Digester Gas	
Contract Name Contract Name	- 0	9	0	0	0	0	0	0	0	0	0	0	9		0	0	0	0				
Contract Name 2003 Contracts SDCWA - Rancho Penaequitos	0	0	0	0	17,519 17,519	21,885 21,885	10,000	10,000	10,000	10,000	10,000	10,000	10,000 10,000	10,000	833 833	0	0	0	Contract Status CPUC approved	Facility Status online	Resource Type Conduit Hydro	
Contract Name Contract Name Contract Name Contract Name	0	9	0	0	0		0	0	0	000	0	0	0	0	0	0	0	0				
Contract Name Contract Name Contract Name	0	0	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0				
Contract Name Contract Name Contract Name	9	0	0	0		0	0	0	0	0	0	0	0	0	0		0	0				
Contract Name	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
Contract Name Contract Name		0	0	0				0		0	0		0	0	0		0	0				Minimum Contracting Requirement
Contract Name	- 0	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0				Minimum Contracting Requirement Starting in 2007, RPS-obligated LSEs must, in each calendar year, enter into long-term contracts and/or sh term contracts with new facilities for energy deliveries
Contract Name 2004 Contracts Kumeysay	9	9	0	102,779	175,836 148,007	153 300	239,176 168,192		168 192	1,809,676	1,809,676	155,102	1,833,154	1,833,154 167,900		1,815,119 167,900	1,833,013 167,900	1,833,013 1,67,900	Contract Status	Facility Status	Resource Type Word	equivalent to at least 0.25% of that LSE's prior year's retail sales ('minimum quantity') in order to be able to
Coverta Otay 3 MM Prima Dashecha	0	0	0	0	19,689	25.201 38.255	24.000 46.984	24,000 46,984 259,210	24,000 46,984 648,000	24.000 46.984 648,000	24,000 46,984 648,000		24.000 70.754 648,000	24.000 70.754 648,000		75,719 548,000	94.613 648,000	94.613	CPUC approved CPUC approved CPUC approved	online online under development - on schedule	Landfill Gas Landfill Gas Solar Thermal	equivalent to at least 0.25% of that LST's prior year's retail sales ("minimum quantity") in order to be able to count energy deliveries from short-form contracts with existing RPS-eligible facilities, for any RPS compliance purpose. (D.07-05-028, R.05-02-012)
String Phase I Pacific Wind Eameralds I (Truckhaven)		0	0	0	0	0	0	0	251,275 319,440	603,060 319,440	603,060 319,440	603,060 319,440	503,060 319,440	603,060 319,440	603,060 319,440	503,050 319,440	603,060 319,440	603,060	CPUC approved pending CPUC approval	under development - de schedule under development - delayed under development - on achedule	Wnd Geothermal	
Contract Name Contract Name Contract Name	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				Long-term central: All least 10 years' duration - Short-term central: All least 10 years' duration - Short-term central: Least than 15 years' duration - New Facility: Commenced commercial operation on stite: January 1, 2005 - Existing Facility: Commenced commercial operation prior to January 1, 2005
Contract Name Contract Name Contract Name	- 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				after January 1, 2005 - Existing Facility: Commenced commercial operation
Contract Name Contract Name Contract Name	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				pnor to January 1, 2005
Contract Name Contract Name 2005 Contracts	0	0	0	0	0	323,735	555,035	951,134	1,193,228	1,193,228	1,171,228	1,171,228	1,171,228	1,171,228	1,171,228	806,374	806,374	806,374	Contract Status	Facility Status		Contract Length / Type Contract Volume (MWh
Eamersida II, San Felipe Mt Signal Solar (formerly Bethel 1) MMR 92, name TBD; (currently Bethel 2)		9	0	0	0	0	0	228,013 168,086 168,181	166,090 304,017 168,086	165,090 304,017 168,086	165,090 304,017 168,086	304,017	165,090 304,017 168,080	166,090 304,017 168,086	165,090 304,017 168,086	165,090 304,017 168,086	165,090 304,017 168,086 168,181	165,090 304,017 168,086	CPUC approved pending CPUC approval CPUC approved CPUC approved	under development - on schedule under development - on schedule under development - on schedule	Geothermal Solar Thermal Solar Thermal	nia 166,6 nia 304,6 nia 168,6 nia 168,6
3005 Contracts Extrements at , San Felips M Signal Solar (former) Behal 1) MMR RV, name TDC (converty Behal 2) BMM Mone Energy Cowarts Olders (brenzy) AES Delano) San Diago MFIO (Ports Lens) San Diago MFIO (Ports Lens) Contract Numes Contract Numes Contract Numes Contract Numes		0	0	0	0	317,755 5.980	168,181 364,854 22,000	168,181 364,854 22,000	168,181 364,854 22,000	168,181 364,854 22,000	158,181 354,854	158,181 354,854 0	168,181 384,854	168,181 364,854	158,181 354,854 0	168,181	168,181	168,181	CPUC approved CPUC approved CPUC approved	under development - delayed online online	Bornass Digester Gas	2007 long-term 168,1 n/a 364,8 n/a 22,0
Contract Name Contract Name Contract Name	0		0	0		0	0	0	0	0	0			0	0	0	0	0				
Contract Name Contract Name Contract Name Contract Name		0	0	0	0	0	0	0		0	0	0	0	0	0	0	0	0				
Contract Name	9	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
Contract Name Contract Name	- 0		0	0	0	0	0	0	0		0	0		0		0	0	0				
Contract Name 2006 Contracts	-	-	0			3.942	11.826		41,510	41,510	41,610	41,610	41.610	41.610	41.510	41,610	41.610	41.610	Contract Status	Facility Status	Resource Type	Contract Length / Type Contract Volume (MWh)
2006 Contracts Envirepel - Vata Envirepel - Ramona Contract Name						3,942	11,826	0	41,510	41.510	41,510	41,510	41,610	41,610	41,610	41,610	41.610	0	CPUC approved pending CPUC approval	under development - delayed pre-development stage	Bonass	2007 short-term / new 11,82 2007 long-term 41,61

RPS COMPLIANCE REPORT - August 2008

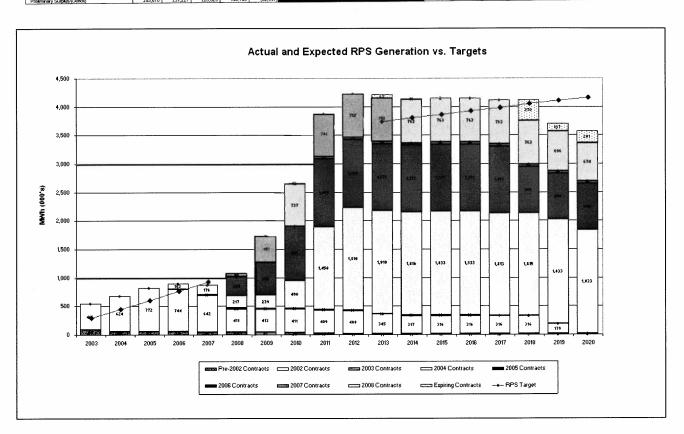
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2007 Contracts			0							0		0			0			0	0	Contract Status	Facility Status	Resource Type	Contract Length / Type	Contract Volume (MWh)
Contract Name			0									0	0	0	0			0	0					
Contract Name Contract Name Contract Name								5	0			0	0			0		0	0					
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Contract Name		0	0							0	0	0	0			0		0	0					
Contract Name																		0						
Contract Name						- 0	24.15	7 461,090	736,661	744,370	762.070	759,755	753,304	763,304	763,304	763,304	787 704	695,984	ET3 544	Contract Flat o	Facility Flates	Resource Type	Contract Length / Type	Contract Volume (MWh)
2006 Contracts Naturanay (Glarier We	nd Energy 1)						54.16	7 325.000	325.000	325,000	752,079 325,000	325,000	325,000	325.000	325.000	325.000	763,304 325,000	325.000	325,000	Contract Status pending CPUC approval	Facility Status under development - on schedule	Word	n'a	325,000
Naturener (Glacier We	nd Energy 2)							64 583 67.320	310,000 89,760	310,000	310.000 89.760	310,000	310,000	310,000	310 000 89.750	310,000	310.000 89.760	310,000	310,000	cendino CPUC accroval cendino CPUC accroval	under development - on achedule under development - on achedule	Wnd	nia	310,000
Renewable Egy Provid	ind Energy 1) ind Energy 2) derx (Blue Lake Power) oj (UOG - PV), A 28-07-017, file	0	0					67.320	89.760	89.750	89.760	310,000 89,760	310,000 89,760		89.750	89.760	89.760		0	pending CPUC approval	under development - on schedule	Bonass	nia	22.440 38.544
SDG&E Solar Egy Pro	oj (UDG - PV), A 08-07-017, file		0					4.192	11,901	19.510	27.319	35.028	38,544	38.544	38.544	38,544	38,544	38,544	38.544	pendino CPUC approval	pre-development stage	Solar PV	nia	38.544
Contract Name																								
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Contract Name Contract Name Contract Name		0 0 0 0 0	0 0 0 0 0		0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0		0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0	000000000000000000000000000000000000000	0 0 0	0 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	000000000000000000000000000000000000000	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0					
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RPS COMPLIANCE REPORT - August 2008

RPS Compliance Report: Performance Chart

SDG&E 8/15/2008

			Actual MWh				Forec	net MWh			Forecast MW					Forecast MWf			
RP8 Procurement and Targets (MWh)	2002	2004	2005	2006	2007	2008	2	2009	2910	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
	15 043 865	15.811.591	16.001.516	16 846 888	17.056.023						18,736,690	19,044,058	19,346,534	19,649,908	19,949,935	20,237,822	20.522,220	20,810,607	21,102,513
Total Retail Sales	15,043,005	15,611,331	10,001,010	F 00/	5.2%						The state of the s	22.1%	21.7%	21.4%	21.1%	20.6%	18.5%	17.4%	16.2
Actual RPS Procurement %	3.7%	4.5%	5.276	5.676								64.578	61.473	60,495	60.675	60,005	57,578	56,880	57,677
IPT	N/A	150.439	158,116	160,015								20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0
APT % (Baseline for 2003)	N/A	3.0%	3.8%	4.8%									3,808.812		3.929.982	3.989.987	4.047,564	4.104.444	4.162.121
APT as MWh Amount	N/A	446,625	604,741	764,756								3,747,338			216.063		(298.826)	(540.261)	(799.08)
2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	252 670	221 227	220.625	134 765	(52 447)							401,344	321,249	276,738	210.003	125,062	(280,020)	(340,201)	(135,002



RPS Compliance Report: Calculations

RPS E	Baseline Inputs (MWh)	
Line#	Calculation	Notes
1	User supplied data	Pursuant to D.07-03-046, the 2003 Initial Baseline Procurement Amount for the investor owned utilities (IOUs) is
<u>2</u>	User supplied data	calculated using the following equation:
<u>3</u>	User supplied data	2001 RPS Eligible Procurement X 2003 Total Retail Sales + 1% of 2001 Total
4	Baseline formula =	2001 Total Retail Sales Retail Sales

RPS P	rocurement and Targets (MWh)	
	Calculation	Notes
<u>5</u>	User supplied data	Annual Retail Sales
<u>6</u>	Data from "Procurement Detail" tab	In current and past years, this line should equal Total RPS Eligible Procurement in procurement detail tab.
<u>7</u>	Prior year Line 7 + Line 8	
<u>8</u>	1% of line 5 {Y-1}	
9	Line 6 - Line 7	
<u>10</u>	Line 7 / Line 5 {Y-1}	
<u>11</u>	Line 6 / Line 5 {Y-1}	In 2003, 2003 RPS procurement is divided by 2001 retail sales rather than 2002 retail sales.
<u>12</u>	(Line 6 + Line 17 + Line 25 + Line 30 + Line	RPS procurement percentage after applying flexible compliance, assuming all allowable planned deliveries
	34 + Line 36) / Line 5 {Y-1}	come online as planned.

Flexible Compliance - IPT Deferral		
Calculation	Notes	
13 Up to 0.25% of Prior Year Retail Sales	The first year with an IPT, 100% of the IPT can be deferred for up to 3 years without explanation.	
14-16 User supplied data		
17 Sum of Lines 14:16	Current year deficit carried forward. Warning if cell value is greater than Line 13.	
18-20 Record of Lines 14:16	Deferred IPT obligations due in current year.	
21 Sum of Lines 18-20	Total deferred IPT obligations due in current year	
22-24 User supplied data	Past year IPT obligations retired with current year surplus procurement. Per accounting rules D. 06-10-050,	
	Attachment A, page 9-10, current year deliveries may only be applied to past year IPT deficits after earmarked	
	deliveries have been subtracted, and after any deliveries needed to meet current year APT have also been	
	subtracted (D.03-06-0711, Conclusion of Law 25).	
25 Sum of Lines 22-24	Total current year surplus applied to prior year IPT obligations due in current year	

Flexible Compliance - Earmarking	
Calculation	Notes
26 Line 9 + Line 13 + Line 34	Portion of current year deficit greater than allowable IPT Deferral
27-29 Data from "Earmarking Detail" tab	User supplied data
30 Sum of Lines 27:29	
31-33 Data from "Earmarking Detail" tab	User supplied data. Current year deliveries may only be applied to past year deficits which have been
	deferred by earmarking, after current year APT has been met (D.03-06-071), Conclusion of Law 25).
34 Sum of Lines 31:33	Total current year surplus subtracted to meet prior years Earmarking obligations due in current year

ſ	Surplus Procurement Bank		
		Calculation	Notes
- 1	25	Line 38 {Y-1}	
- 1	36	User supplied data	
	37	Line 9+ Line 25 + Line 34	Current year surplus procurement less any prior year IPT obligations and/or Earmarking obligations
ľ	38	Sum of Lines 35:37	

Adjusted Deficit		
	Calculation	Notes
<u>39</u>	Line 9 + balance of IPT obligations after 3	In any current year, the adjusted annual procurement deficit is the LSE's annual deficit less any deliveries
	years + balance of Earmarking obligations	used to meet IPT or Earmarking obligations for prior years deficits. Any portion of adjusted annual
	after 3 years	procurement deficit that remains after the following three years is subject to penalty.
<u>40</u>	Balance of IPT obligations after 3 years +	In any current year, the adjusted deficit temporarily excused is the sum of IPT deferral and Earmarked
	balance of Earmarking obligations after 3	deliveries (line 17+ line 30). Any portion of line 40 remaining after 3 years will be reflected in line 39 and
<u> </u>		subject to penalty.
<u>41</u>	Line 39 * \$50.0	Per accounting rules, LSEs must list penalty based the size of on adjusted annual procurement deficit, even if
		allowable reasons are being given for why the penalty is not yet due and payable. Penalties are assessed at
<u> </u>		\$0.05/kWh deficit.
<u>42</u>	(Line 39 + 40) * \$50.0	LSE's have the opportunity to make up annual procurement deficits through existing flexible compliance rules.
		Accordingly, if an LSE has a deficit in year 1, and is able to fully exercise flexible compliance mechanisms, the
		penalty for year 1 compliance may not apply.

OFFICER VERIFICATION FORM

I am an officer of the reporting corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. The spreadsheet format used to file this compliance report has not been altered from the version issued or approved by Energy Division.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 13, 2008 at San Diego, California.

Matt Burkhart, VP Electric & Gas Procurement - SDG&E (Signature and Title of Corporate Officer)

Matt Burkhart, VP Electric & Gas Procurement - SDG&E (Signature and Title of Corporate Officer)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DECLARATION OF PATRICK CHARLES REGARDING CONFIDENTIALITY OF CERTAIN DATA

- I, Patrick K. Charles, do declare as follows:
- 1. I am Senior Energy Administrator in the Electric & Gas Procurement
 Department for San Diego Gas & Electric Company ("SDG&E"). I have reviewed
 SDG&E's August 15, 2008 Renewable Portfolio Standard ("RPS") Compliance Filing
 ("August 15 Compliance Filing"), submitted concurrently herewith. In addition, I am
 personally familiar with the facts and representations in this Declaration and, if called
 upon to testify, I could and would testify to the following based upon my personal
 knowledge and/or belief.
- 2. I hereby provide this Declaration in accordance with D.06-06-066 and D.08-04-023 to demonstrate that the confidential information ("Protected Information") provided in the August 15 Compliance Filing submitted concurrently herewith, falls within the scope of data protected as pursuant to the IOU Matrix attached to the Commission's confidentiality decision, D.06-06-066 (the "IOU Matrix") or under relevant statutory provisions.
- 3. <u>SDG&E's Protected Information:</u> The Protected Information, consisting of the information described below, is protected pursuant to the following IOU Matrix categories:

Data at issue	D.06-06-066 Matrix	How moving party meets
	Requirements	requirements
Bundled Retail Sales	Demonstrate that the material	This data is SDG&E's forecast
	submitted constitutes a	of its bundled customer total
	particular type of data listed in	energy requirements.

	the IOU Matrix	
	Identify the Matrix category or	This information is protected
	categories to which the data	under IOU Matrix category
	corresponds	V.C.
	Affirm that the IOU is	In accordance with the
	complying with the limitations	limitations on confidentiality
	on confidentiality specified in	set forth in the IOU Matrix,
	the Matrix for that type of data	SDG&E requests that the
	31	current year projection and the
		"front three years" of this
		information be kept
		confidential.
	Affirm that the information is	SDG&E has not publicly
	not already public	disclosed this information and
	not aneady public	is not aware that it has been
	A CC was that the data courset ha	disclosed by any other party.
	Affirm that the data cannot be	The information was provided
	aggregated, redacted,	in the form required by the
	summarized, masked or	Energy Division. It would not
	otherwise protected in a way	be possible to provide a
	that allows partial disclosure.	complete response if the data
		were to be aggregated,
		redacted, summarized or
		masked.
Annual Procurement	Demonstrate that the material	Since APT is a formula linked
Target ("APT"),	submitted constitutes a	to Bundled Retail Sales
including APT Target	particular type of data listed in	Forecasts, disclosure of APT
Points on the	the IOU Matrix	would allow interested parties
Performance Chart		to easily calculate SDG&E's
		Total Energy Forecast –
		Bundled Customer (MWH).
	Identify the Matrix category or	This information is protected
	categories to which the data	under IOU Matrix category
	corresponds	V.C. – years 2009 – 2012.
		This information is protected
		under IOU Matrix category
		VI.B. – year 2008. ¹
		, 1.D. your 2000.

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¹ Although the January 25, 2008 *Administrative Law Judge's Ruling Partially Granting Motions to File Certain Material Under Seal* denied confidential treatment for lines 7-40 (year 2007, 'Accounting' tab) of SDG&E's September 13, 2007 RPS Compliance Report, confidential treatment should be afforded to lines 7-40 (year 2008, 'Accounting' tab) of SDG&E's August 15 Compliance Filing pursuant to IOU Matrix category VI. B. (net short position). These lines of information should be protected under IOU Matrix category VI. B. because SDG&E issued a short term RFO on December 14, 2007 (bids were due on January 11, 2008), and an RFO seeking both short and long term resources issued on March 10, 2008 (for which bids were due April 30, 2008), and consequently disclosure of any net short position that SDG&E may have in 2008 would undermine SDG&E's bargaining position relative to short term offers.

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	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the "front three years" of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
Incremental Procurement Target ("IPT")	Demonstrate that the material submitted constitutes a particular type of data listed in the IOU Matrix	Since IPT is a formula linked to Bundled Retail Sales Forecasts, disclosure would allow interest parties to easily calculate SDG&E's Total Energy Forecast – Bundled Customer (MWH).
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected under IOU Matrix category VI.B. – year 2008. ²
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the "front three years" of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been

² See footnote 1, above.

		disclosed by any other party
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	disclosed by any other party. The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
Preliminary Procurement/Surplus Deficit	Demonstrate that the material submitted constitutes a particular type of data listed in the IOU Matrix	Procurement Surplus/Deficit data must be protected in order to avoid disclosing APT. If APT is disclosed, SDG&E's Bundled Retail Sates data could be calculated.
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected under IOU Matrix category VI.B. – year 2008. ³
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the "front three years" of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
APT Percentage	Demonstrate that the material submitted constitutes a particular type of data listed in	Since APT Percentage is a formula linked to Bundled Retail Sales Forecasts,

³ See footnote 1, above.

	the IOU Matrix	disclosure of APT would allow interest parties to easily calculate SDG&E's Total Energy Forecast – Bundled Customer (MWH).
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected under IOU Matrix category VI.B. – year 2008. ⁴
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the "front three years" of this information be kept confidential.
	Affirm that the information is not already public	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	Since APT Percentage is a formula linked to Bundled Retail Sales Forecasts, disclosure of APT would allow interest parties to easily calculate SDG&E's Total Energy Forecast – Bundled Customer (MWH).
Actual Procurement Percentage	Demonstrate that the material submitted constitutes a particular type of data listed in the IOU Matrix	Actual Procurement Percentage data must be protected in order to avoid disclosing SDG&E's Bundled Retail Sates data.
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected

⁴ See footnote 1, above.

		under IOU Matrix category VI.B. – year 2008. ⁵
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the "front three years" of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
Adjusted Procurement Percentage	Demonstrate that the material submitted constitutes a particular type of data listed in the IOU Matrix	Adjusted Procurement Percentage data must be protected in order to avoid disclosing SDG&E's Bundled Retail Sates data.
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected under IOU Matrix category VI.B. – year 2008. ⁶
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the "front three years" of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and

⁵ See footnote 1, above. ⁶ See footnote 1, above.

		is not aware that it has been
		disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
Maximum Deficit	Demonstrate that the material	MDEFD data must be
Eligible for Deferral ("MDEFD")	submitted constitutes a particular type of data listed in the IOU Matrix	protected in order to avoid disclosing IPT. If IPT is disclosed, SDG&E's Bundled Retail Sates data could be calculated.
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected under IOU Matrix category VI.B. – year 2008.
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the "front three years" of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
Strategies Associated	Demonstrate that the material	Utility net short data is
with Application of	submitted constitutes a	protected under the IOU

⁷ See footnote 1, above.

Flexible Compliance	particular type of data listed in	Matrix. Information regarding
_		
Tools, Surplus	the IOU Matrix	the need to use flexible
Procurement Bank,		compliance mechanisms
Adjusted Deficit and		including earmarking
Earmarking Detail		provisions would signal an
		RPS procurement shortage and
		would highlight an RPS net
		short position.
	Identify the Matrix category or	This information is protected
	categories to which the data	under IOU Matrix category
	corresponds	VI.B.
	Affirm that the IOU is	In accordance with the
	complying with the limitations	limitations on confidentiality
	on confidentiality specified in	set forth in the IOU Matrix,
	the Matrix for that type of data	SDG&E requests that the
		"front three years" of this
		information be kept
		confidential.8
	Affirm that the information is	SDG&E has not publicly
	not already public	disclosed this information and
	net unitary paerit	is not aware that it has been
		disclosed by any other party.
	Affirm that the data cannot be	The information was provided
	aggregated, redacted,	in the form required by the
	summarized, masked or	
	_	Energy Division. It would not
	otherwise protected in a way	be possible to provide a
	that allows partial disclosure.	complete response if the data
		were to be aggregated,
		redacted, summarized or
		masked.

The Commission previously considered and approved application of IOU Matrix confidentiality protection to the categories of information listed above in its *Administrative Law Judge's Ruling on San Diego Gas & Electric Company's April 3*, 2007 Motion to File Data Under Seal, issued May 4, 2007 in R.06-05-027, its subsequent

⁸ In the case of the 'Earmarking Detail' SDG&E requests that data from the current year through 2020 be kept confidential. This is in accordance with the motion filed by SDG&E on May 21, 2007 and the ALJ Ruling issued on June 28, 2007 (*Administrative Law Judge's Ruling Granting San Diego Gas & Electric Company's May 21, 2007 Amendment to April 3, 2007 Motion and May 22, 2007 Amendment to August 1, 2006 Motion*) which granted confidential treatment as included in SDG&E's April 3, 2007 RPS Compliance filing.

Administrative Law Judge's Ruling Granting San Diego Gas & Electric Company's May 21, 2007 Amendment to April 3, 2007 Motion and May 22, 2007 Amendment to August 1, 2006 Motion, issued June 28, 2007 in R.06-05-027, and Administrative Law Judge's Ruling On (A) SDG&E's Motions Regarding Seal Of August 2007 Compliance Report And Amended 2008 RPS Plan Plus (B) Possible Content Of Future Motions, issued March 26, 2008 in R.06-05-027.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 14th day of August, 2008, at San Diego, California.

Patrick K. Charles

Senior Energy Administrator